

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA :

VS.

CR No. 1:24-cr-00012-MRD-PAS

KYLE REYNOLDS :

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**DEFENDANT'S MOTION TO MODIFY CONDITIONS OF RELEASE-  
TRAVEL TO CONNECTICUT FOR LEISURE**

Now comes the Defendant, Kyle Reynolds, and moves this Honorable Court to modify his conditions of release to allow him to travel to Connecticut with his girlfriend for a short vacation.

Mr. Reynolds was released from custody in this case on January 24, 2024. He subsequently obtained employment and has been compliant with the terms of his release for over eighteen months.

If this motion is allowed, Mr. Reynolds and his girlfriend will travel to Rocky Hill, CT on August 18, 2025. They will stay at a hotel and return on August 21, 2025. Mr. Reynolds will provide all details to United States Probation. AUSA Paul Daly has been notified of this request and has no objection.

Respectfully submitted  
Kyle Reynolds  
By his attorney,

/s/ Joanne M. Daley, BBO #653375  
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CERTIFICATION

I hereby certify that a copy of this motion was delivered by electronic notification to Paul Daly, Assistant United States Attorney, on August 8, 2025.

/s/ Joanne M. Daley